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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

PHILOMENA CINDY RINALDI,

Plaintiff,

No. CV 12-0141 (PKC) (ARL)

-against-

NOTICE OF MOTION

QUALITY KING DISTRIBUTORS, INCORPORATED,

Defendant.

PLEASE TAKE NOTICE that upon the annexed Declaration of Rory J. McEvoy, Esq., sworn to on May 31, 2013, and the exhibits thereto; the annexed Rule 56.1 Statement; the accompanying memorandum of law; and all prior proceedings had herein, Defendant Quality King Distributors, Inc. ("Quality King") will move this Court at the United States Courthouse, 500 Pearl Street, New York, New York, on a date and time to be determined by the Court, for an order pursuant to Rule 56 of the Federal Rules of Civil Procedure, granting summary judgment to Quality King, dismissing Plaintiff Philomena Cindy Rinaldi's complaint with prejudice, and granting such other and further relief, including costs and attorneys' fees, as this Court deems just and proper.

Date: New York, New York
May 31, 2013

EDWARDS WILDMAN PALMER LLP

By: 

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